

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER DISASTER SITE  
LITIGATION

Docket No.: 21 MC 100 (AKH)

DECLARATION OF  
CHRISTOPHER R. LOPALO

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CHRISTOPHER R. LOPALO, an Attorney duly licensed to practice before the Courts of the State of New York and a Member of the Bar of this Honorable Court, Declares as follows under penalty of perjury:

1. I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP, plaintiffs' Co-Liaison Counsel in the within matters and offer this Declaration and its accompanying exhibits in response to the Court's November 23, 2011 Order Reminding Plaintiffs of Rule 56 Fed R. Civ. P., and Enlarging Time to Oppose Summary Judgment of the Port Authority of New York and New Jersey ("Port Authority") and in further support of Plaintiffs' Opposition to the Port Authority's Motion to Dismiss that was filed on November 18, 2011.

2. Annexed to this Declaration as Exhibit 1 is a true and correct copy of the affidavit of Plaintiff Sebastian Bartolotta (06-CV-14487).

3. Annexed to this Declaration as Exhibit 2 is a true and correct copy of the affidavit of Plaintiff Maurice Davis (06-CV-09529).

4. Annexed to this Declaration as Exhibit 3 is a true and correct copy of the affidavit of Plaintiff Rosa Ferraro as Executrix of the Estate of Edward M. Ferraro (06-CV-07411).

5. Annexed to this Declaration as Exhibit 4 is a true and correct copy of the affidavit of Plaintiff Richard Prager (07-CV-05041).

6. Annexed to this Declaration as Exhibit 5 is a true and correct copy of the affidavit of Plaintiff Sotereos Samothrakis (07-CV-05070).

7. Annexed to this Declaration as Exhibit 6 is a true and correct copy of the affidavit of Plaintiff Maria Trembone (05-CV-01629).

8. Annexed to this Declaration as Exhibit 7 is a true and correct copy of the affidavit of Plaintiff Michael Vaughan (05-CV-01629).

9. Annexed to this Declaration as Exhibit 8 is a true and correct copy of the affidavit of Plaintiff Richard Volpe (04-CV- 04177).

10. Annexed to this Declaration as Exhibit 9 is a true and correct copy of the affidavit of Plaintiff John Walcott (04-CV-04178).

11. As can be seen in these Plaintiffs' affidavits, these Plaintiffs or their decedents suffered serious injuries after their heroic efforts in the rescue, recovery and debris-removal activities at the World Trade Center site following the terrorist attacks at the World Trade Center and subsequent collapse of the so-called "Twin Towers" on September 11, 2001.

12. Wherefore these Plaintiffs respectfully request that their claims for their own or their decedents' injuries be heard.

13. It should also be noted that the Port Authority's Motion is moot with respect to the following seven Plaintiffs who have elected to voluntarily discontinue or settle their claims with the Port Authority: Patricia Defeo (06-CV-08957), Melvin Glover (06-CV-13928), Charles Logan (06-CV-08448), Robert J. Martin (07-CV-10012), Mimi Netrosio (06-CV-11774), Joseph Ragazzo (08-CV-00764), John Ruis (06-CV-11264) and Michele Schor as the Administratrix of the Estate of Robert Schor (05-CV-01618).

Dated: New York, New York  
December 9, 2011



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Christopher R. LoPalo (CL-6466)

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SOUTHERN DISTRICT OF NEW YORK

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Certification of Service

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**ATTORNEY'S CERTIFICATION OF SERVICE**

Christopher R. LoPalo, an Attorney duly licensed to practice before the Courts of the State of New York and a member of the Bar of this Court, hereby certifies:

That on December 9, 2011, I duly served a true copy of the within Declaration and it accompanying exhibits on all counsel of record through the Court's ECF filing system.

Dated: New York, New York  
December 9, 2011



Christopher R. LoPalo (CL-6466)